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UNITED STATES DISTRICT COURT,
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA LIBERI, et al,

Plaintiff

vs.

ORLY TAITZ, et al,

FILED
Case No.: 09-cv-01898-ECR
MAY 28 2009
MICHAEL E. KUNZ, Clerk
Defendants. Dep. Clerk

STIPULATED DISMISSAL WITHOUT PREJUDICE
OF DEFENDANT YOSEF TAITZ

AND NOW, Plaintiffs, Lisa Liberi, Philip J. Berg, Esquire, Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella and Go Excel Global and Defendant, Yosef Taitz, through their undersigned counsel hereby stipulate and agree as follows:

1. All claims against Defendant Yosef Taitz are hereby Dismissed without Prejudice.
2. Plaintiffs may apply to the Court for leave to join Defendant Yosef Taitz in this action upon satisfaction of all applicable joinder rules and leave of Court. Leave shall be granted only upon the Court's finding that Plaintiffs have established

evidence sufficient to support a cognizable claim against Defendant Yosef Taitz arising out of the allegations in the Complaint filed May 4, 2009. No application for leave to join Defendant Yosef Taitz shall be made later than sixty [60] days before the close of discovery.

3. In the event the Court grants leave to join Defendant Yosef Taitz in this action, Yosef Taitz shall be permitted to assert all defenses available to him as of the date of this stipulation, including but not limited to defenses based upon failure to state a claim and expiration of any applicable statute of limitations.
4. Defendant Yosef Taitz shall be deposed and produce documents in this action as a non-party witness.
5. Counsel for Defendant Yosef Taitz shall continue to be included on the Court's docket for purposes of receiving all filings, and shall be permitted to participate in all discovery proceedings.

IT IS AGREED AND STIPULATED:



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